

# EXHIBIT B

**US 6,876,979 Claim Chart**  
**VS**  
**Vuori's**  
**electronic commerce system**

Case 6:24-cv-00385 Document 1-2 Filed 07/18/24 Page 3 of 25

# U.S. Patent No. 6,876,979

Inventor Marvin T. Ling Current Assignee Aml Ip LLC

Worldwide applications

2002US 2003 JP AUEPWO

Application US10/217,871 events

2002-08-12 Priority to US10/217,871  
2002-08-12 Application filed by PayByClick Corp  
2002-10-15 Assigned to PAYBYCLICK CORPORATION  
2004-02-12 Publication of US20040030605A1  
2005-04-05 Application granted  
2005-04-05 Publication of US6876979B2  
2009-03-27 Assigned to PAYBYCLICK CORPORATION--  
TEXAS  
2009-08-17 Assigned to ACTUS LLC  
2009-08-24 Priority claimed from US12/546,391  
2013-11-04 Assigned to PAYBYCLICK CORPORATION  
2014-01-15 Assigned to GTX CORPORATION  
2017-07-21 First worldwide family litigation filed  
2017-07-21 US case filed in California Northern District Court  
2020-03-02 Assigned to ANDREW M. LING, P.C.  
2020-11-25 Assigned to AML IP LLC  
2020-12-30 US case filed in Texas Western District Court  
2020-12-30 US case filed in Texas Western District Court  
2020-12-30 US case filed in Texas Western District Court  
2021-02-09 US case filed in Delaware District Court  
2021-02-11 Assigned to PRAVATI INVESTMENT FUND IV,  
LP  
2021-02-25 US case filed in California Central District Court  
2021-02-26 US case filed in Texas Western District Court  
2021-04-27 US case filed in Texas Western District Court  
2021-05-24 US case filed in Texas Western District Court  
2021-05-24 US case filed in Texas Western District Court  
2021-05-24 US case filed in Texas Western District Court  
2021-06-11 US case filed in Texas Western District Court  
2021-06-11 US case filed in Texas Western District Court  
2021-06-11 US case filed in Texas Western District Court  
2021-07-14 US case filed in North Carolina Eastern District  
Court  
2021-07-30 US case filed in Texas Western District Court  
2021-10-01 US case filed in Texas Western District Court


Status Active

2023-03-24 Adjusted expiration

# Related Products

- The following chart is based on the review of Vuori's web site.

Backshop Pay



Sign in or create an account


Enter your email to sign in or create an account

Email

Continue with shop Pay

Sign in with a passkey

Order summary



Strato Tech Tee | Chambray Heather  
Chambray Heather / M

\$54.00

Add a discount code or a gift card

Subtotal

\$54.00

Shipping

\$6.00

Taxes

\$4.96

Total

USD \$64.96

Back

shop Pay

English

# US 6,876,979 Claim 1

## CLAIMS:

1. A method for using an electronic commerce system having a bridge computer to allow a user at a user device to make a product purchase at a purchase price from a given vendor having a web site provided by a vendor computer over a communications network, wherein the vendor is associated with at least one of a plurality of service providers wherein each of the plurality of service providers has a service provider computer, and wherein the user has a user account maintained by at least one of the plurality of service providers, the method comprising:

debiting the user's account by the purchase price when the user purchases the product from the given vendor;

determining from among the plurality of service providers, using the bridge computer, whether the given vendor is associated with the same service provider with which the user's account is maintained or is associated with a different service provider; and

if the service provider with which the user's account is maintained is the same as the service provider with which the vendor is associated, crediting the given vendor by the purchase price using funds from the user's account at that same service provider and, if the service provider with which the user's account is maintained is different from the service provider with which the vendor is associated, crediting the given vendor by the purchase price using funds from the service provider with which the vendor is associated and using the bridge computer to reimburse that service provider with the purchase price using funds from the user's account.

**US 6,876,979 : Claim 1**

<p>1. A method for using an <b>electronic commerce system</b></p>	<p>Plaintiff contends that Vuori provides a web site over a communication network, for example at, (<a href="https://vuoriclothing.com/">https://vuoriclothing.com/</a>), for electronic commerce. The screen shot below, shows the code from Vuori's website, and a search word that is typed in, for example, "Online" details Vuori's webpage provides an online store "<b>activity from merchant online stores</b>". This means that Vuori uses an electronic commerce system to sell its products.</p>
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▼email?requires\_shipping=true&shopify\_domain=vuori-clothing.myshopify.com&checkout\_token=48879a3968a... — pay.shopify.com/pay

14 ...g activity from merchant **online** stores when you sign in with your Shop account at merchant stores. %{learn\_more}&quot;,&quot;lea

14 ...ot;&quot;Track all your **online** shopping in one place&quot;,&quot;scan\_to\_download&quot;:&quot;Scan code with your phone to c

14 ...ot;&quot;Track all your **online** orders in one place&quot;,&quot;scan\_to\_download&quot;:&quot;Scan to download&quot;,&quot;ct

**US 6,876,979 : Claim 1**

1. A method for using an electronic commerce system having a **bridge computer**

AML alleges that Vuori's electronic commerce system uses a **bridge computer** at Vuori.

AML alleges that Vuori must use a **bridge computer** to process and facilitate online purchases when customers use, for example, a Credit or debit card or Shop Pay.

AML also alleges that Vuori's **Bridge computer** will also keep track of the different service providers that are **associated** with Vuori (Vendor), for example, Shop Pay and to keep track of different service providers that are not associated with Vuori for example, Debit or credit card companies.

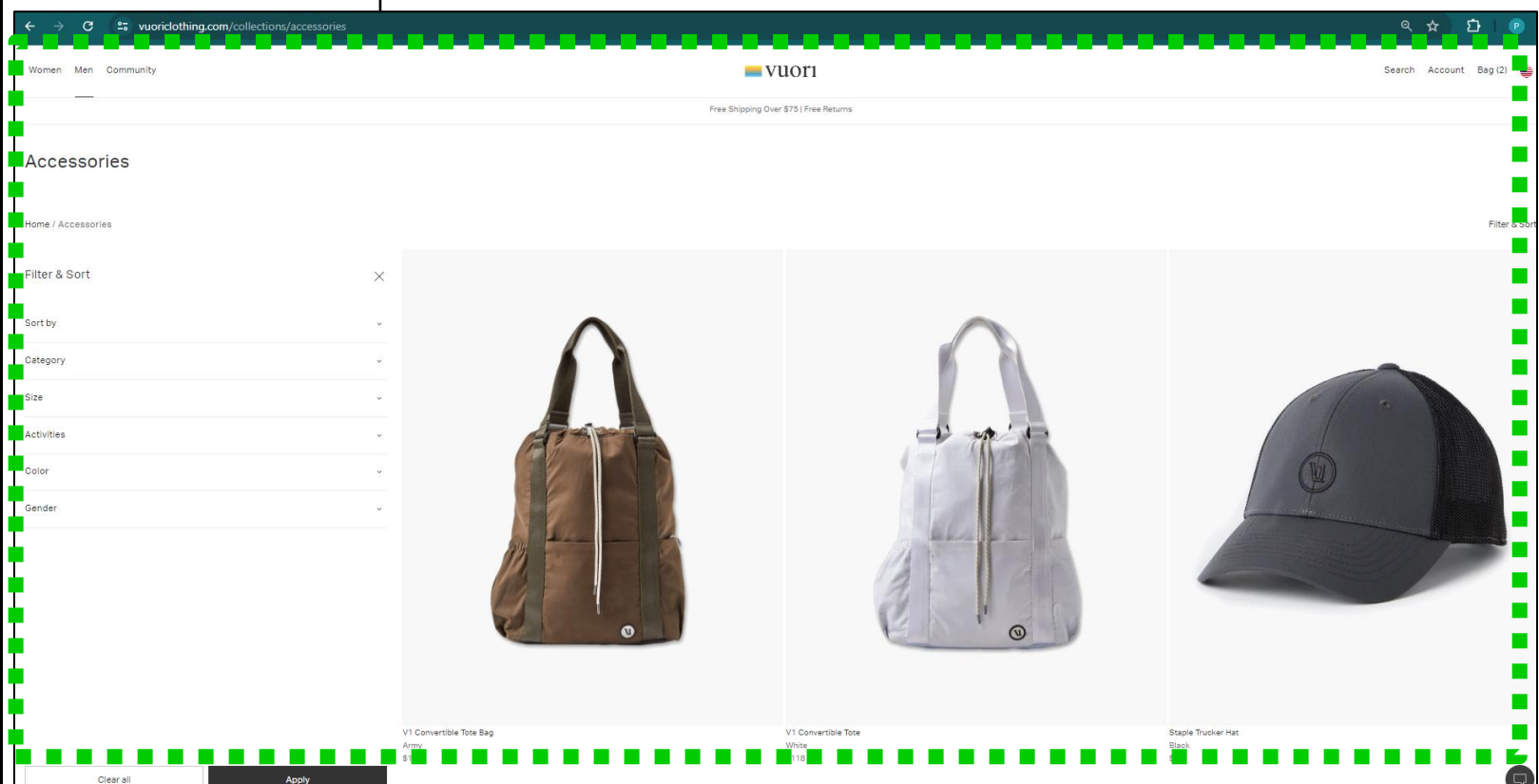
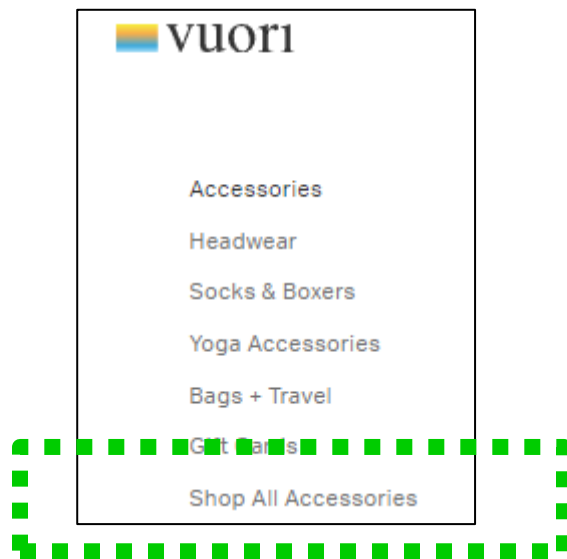
A **bridge computer** is defined in the '979 patent Abstract as, "A **bridge computer** may be used to **facilitate interactions between service providers**. The bridge computer may be used to **implement service charge fees, to reimburse service providers for credit card transaction fees, to reimburse service providers with appropriate referral fees, and to otherwise support operation of the system.**"

A **bridge computer** is also defined in the '979 patent Col:1 Row: 43-45, as, "A **bridge computer** may be used to **support purchase transactions and to facilitate interactions between different service providers.**"

**US 6,876,979 : Claim 1**

1. A method for using an electronic commerce system having a bridge computer **to allow a user at a user device**

AML alleges that Vuori provides a web site over a communication network, for example at, (<https://vuoriclothing.com/>), for electronic commerce. The screen shot below, shows Vuori prompting customers to “**shop all Accessories**”, meaning the customer or user can order online, by shopping from a user's device for example, a desktop, or tablet, smart phone, smart watch on a Vendors website (Vuori).



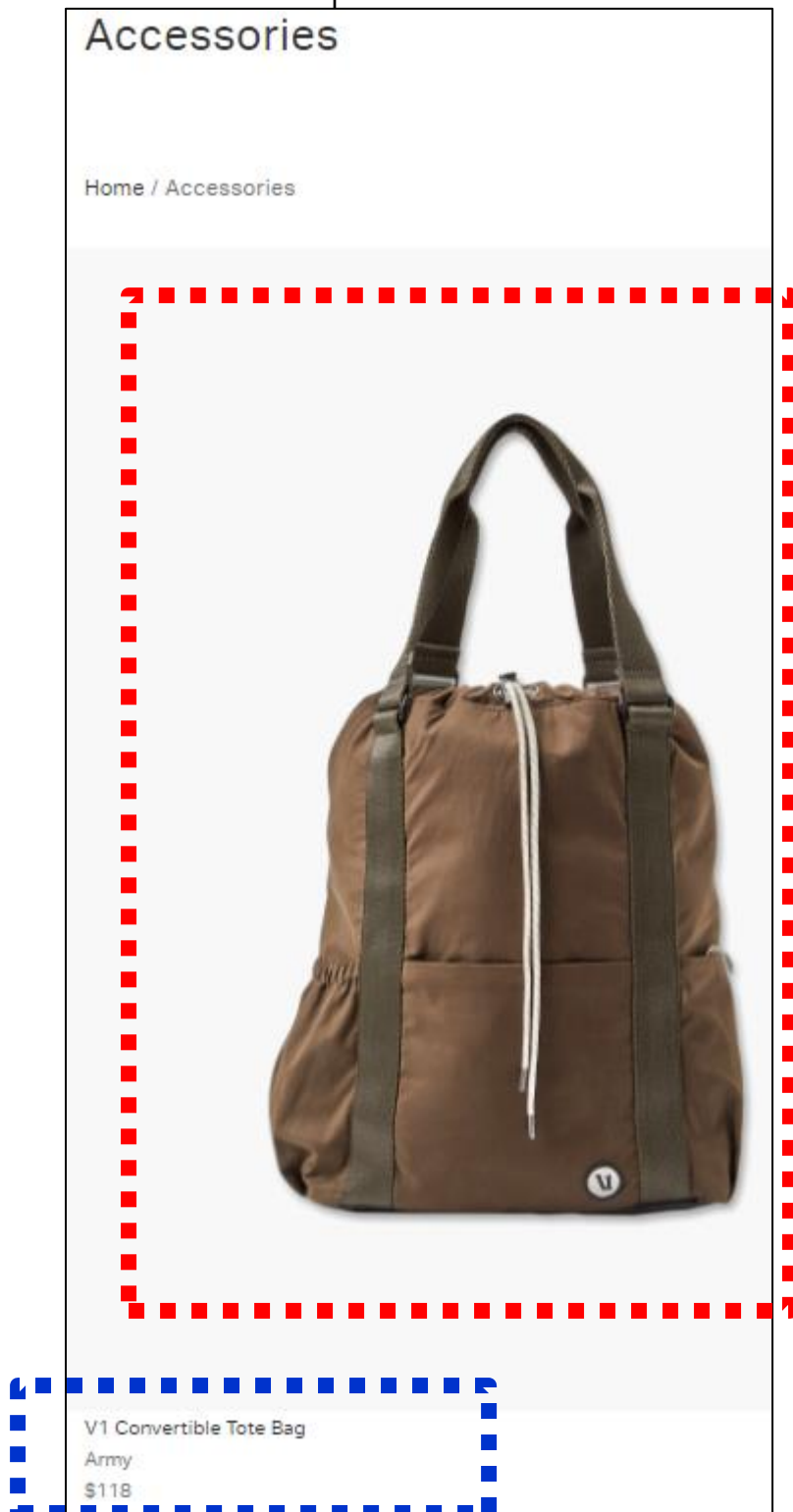
<https://vuoriclothing.com/>



# US 6,876,979 : Claim 1

1. A method for using an electronic commerce system having a bridge computer to allow a user at a user device to make a product purchase at a purchase price

AML alleges that Vuori provides a web site over a communication network, for example the screen shot below at, (<https://vuoriclothing.com/>), for electronic commerce allows a user to purchase, for example, “Tote Bag” at a purchase price for example, “\$118”.

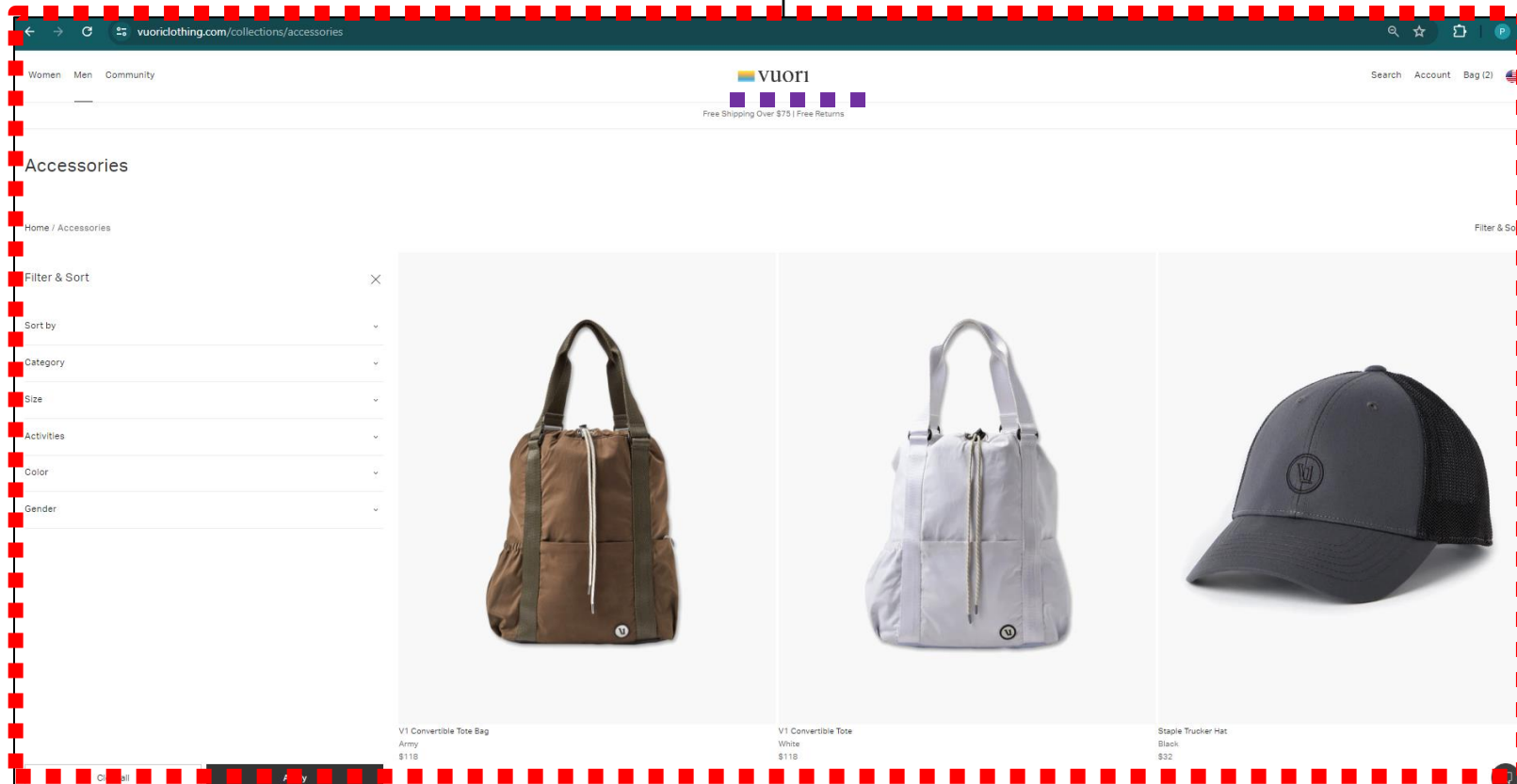


<https://vuoriclothing.com/>

**US 6,876,979 : Claim 1**

1. A method for using an electronic commerce system having a bridge computer to allow a user at a user device to make a product purchase at a purchase price **from a given vendor having a web site provided by a vendor computer over a communications network,**

AML alleges that a Vendor, **Vuori**, **provides a web site over a communication network,** for example at, **(https://vuoriclothing.com/).**



<https://vuoriclothing.com/>

wherein the vendor is associated with at least one of a plurality of service providers wherein each of the plurality of service providers has a service provider computer,

For example, “**Vuori**” is a Vendor associated with “**Shop Pay**”, a service provider that uses a computer to manage a user account that is created after the user clicks “**Sign in or create an account**”. The ‘979 patent at Col: 3 Rows: 45-49, says “Vendors may be associated with particular service providers. For example, some vendors may register with a service provider. Registered vendors may be featured in an on-line mall or shopping area of the service provider's web site. A user may establish an account at the service provider. Once the account has been established, the user may purchase products from associated vendors without registering individually with each associated vendor.”

< Back

shop Pay

**vuori**

Sign in or create an account

Enter your email to sign in or create an account

Email

Continue with shop Pay

Sign in with a passkey

Order summary

Strato Tech Tee | Chambray Heather \$54.00

Chambray Heather / M

Add a discount code or a gift card

Subtotal	\$54.00
Shipping	\$6.00
Taxes	\$4.96
<b>Total</b>	<b>USD \$64.96</b>

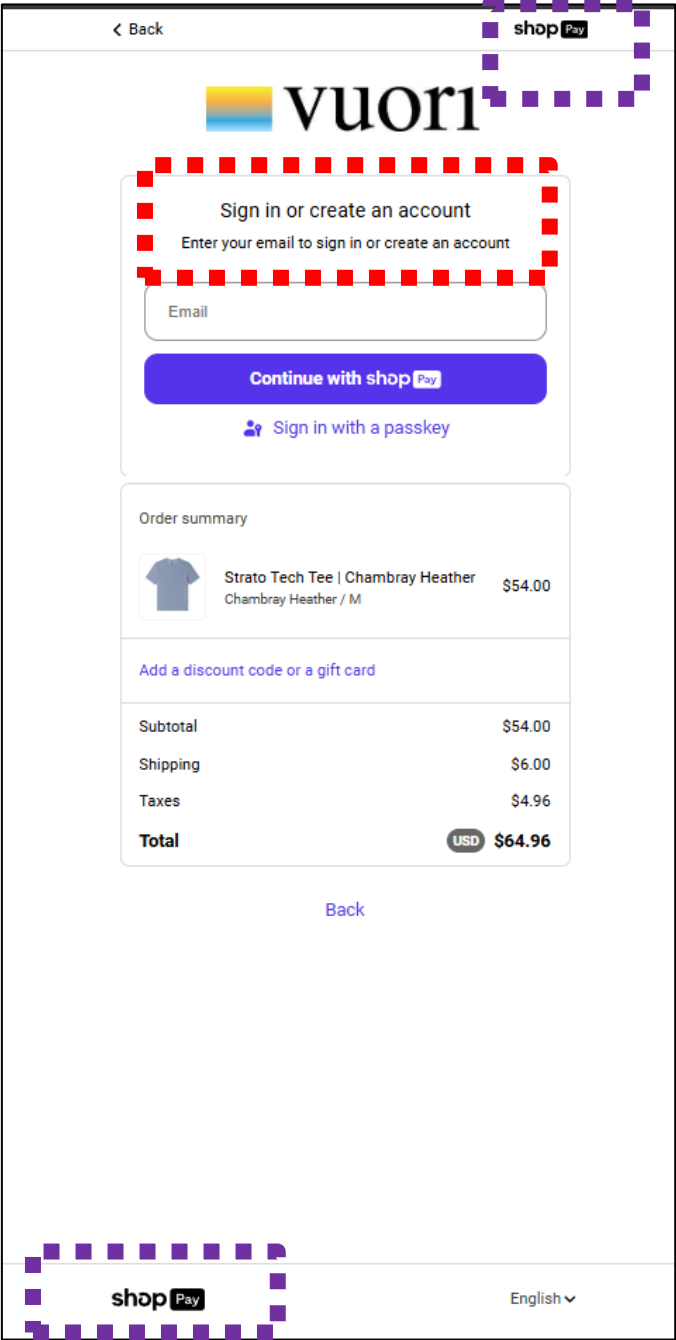
Back

shop Pay

English

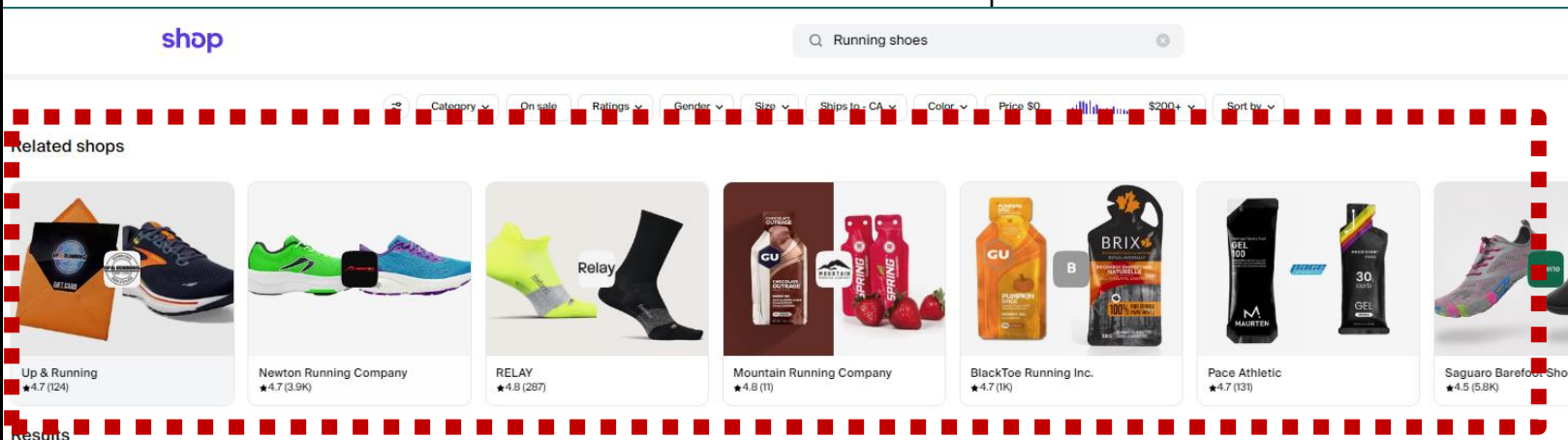
and wherein the user has a user account maintained by at least one of the plurality of service providers, the method comprising:

AML alleges that, “Shop Pay”, is a service provider that uses a computer to manage a user account that is created after the user “create an account”. AML also alleges that Shop Pay must have a computer to input customer account information so that Shop Pay can track payment information made to Shop Pay.



wherein the vendor is **associated with at least one of a plurality of service providers** wherein each of the plurality of service providers has a service provider computer, and wherein the user has a user account maintained by at least one of the plurality of service providers, the method comprising:

For example, **Shop Pay** is a **service provider** that uses a computer and a **website to promote products**, for example, gift cards, electronics, etc, as can be seen in Shop Pays website below. A user **has an account maintained by Shop Pay** and **Shop Pay is associated with Vuori**.



<https://shop.app/search/results?query=Running%20shoes>

**US 6,876,979 : Claim 1**

wherein the vendor is associated with at least one of a plurality of service providers wherein each of the plurality of service providers has a service provider computer, and wherein the user has a user account maintained by at least one of the plurality of service providers, the method comprising:

For example, Shop Pay is a service provider that uses a website to promote products and is associated with Vuori.

Service providers associated with service provider computers 18 may be used to provide Internet services for users. Different service providers may provide different levels of service. **For example, some service providers may serve primarily as content aggregators. A service provider of this type may maintain a virtual presence on the web in the form of a web site. The web site may serve as a portal by offering access to many different types of Internet content and services.** Access may be provided by providing web links to sites of interest and by hosting original content and services. Another service provider may serve the same portal function and in addition may offer on-line access to customers (e.g., broadband or dial-up Internet access using an Internet account associated with the service). These different types of service provider are referred to collectively herein as "service providers" or "Internet service providers."

COL 3: RW 22-32 979' patent

- service provider = a business that provides internet-related services to customers: Shop Pay
- bridge computer = a computer that supports electronic commerce between users, vendors, and service providers: Vuori's computer
- vendor: Vuori

**US 6,876,979 : Claim 1**

wherein the vendor is associated with at least one of a plurality of service providers wherein each of the plurality of service providers has a service provider computer, and wherein the user has a user account maintained by at least one of the plurality of service providers, the method comprising:

For example, Shop Pay is a service provider that uses a website to promote products and is associated with Vuori.

The courts have entered its final construction for “service provider” As “ a business that provides internet-related services to customers.”

Shop Pay is a service provider that provides internet-related services such as promoting products from their website.

Case 6:20-cv-01199-ADA Document 29 Filed 12/09/21 Page 1 of 2

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**AML IP, LLC**

*Plaintiff,*

**v.**

**REBILLY, INC.,**

*Defendant.*

**6-20-CV-1199-ADA**

**FINAL CLAIM CONSTRUCTIONS OF THE COURT**

The Court provided preliminary claim constructions on December 7, 2021 for U.S. Patent No. 6,876,979. The Court held a claim construction hearing on December 8, 2021, in which the Court heard argument on the following claim terms: (1) “bridge computer”; and (2) “service provider.” Dkt. No. 26. After careful consideration of the parties’ briefs, oral argument, and the applicable law, the Court enters its final constructions for each term as shown below.

<b>Claim Term</b>	<b>Court’s Final Construction</b>
bridge computer Claims: 1, 2, 4, 5, 6, 7, 8, 9, 10	a computer that supports electronic commerce between users, vendors, and service providers

<b>Claim Term</b>	<b>Court’s Final Construction</b>
service provider Claims: 1, 2, 5, 6, 8, 9, 10	a business that provides internet-related services to customers

debiting the **user's account** by the purchase price when the user purchases the product from the given **vendor**;

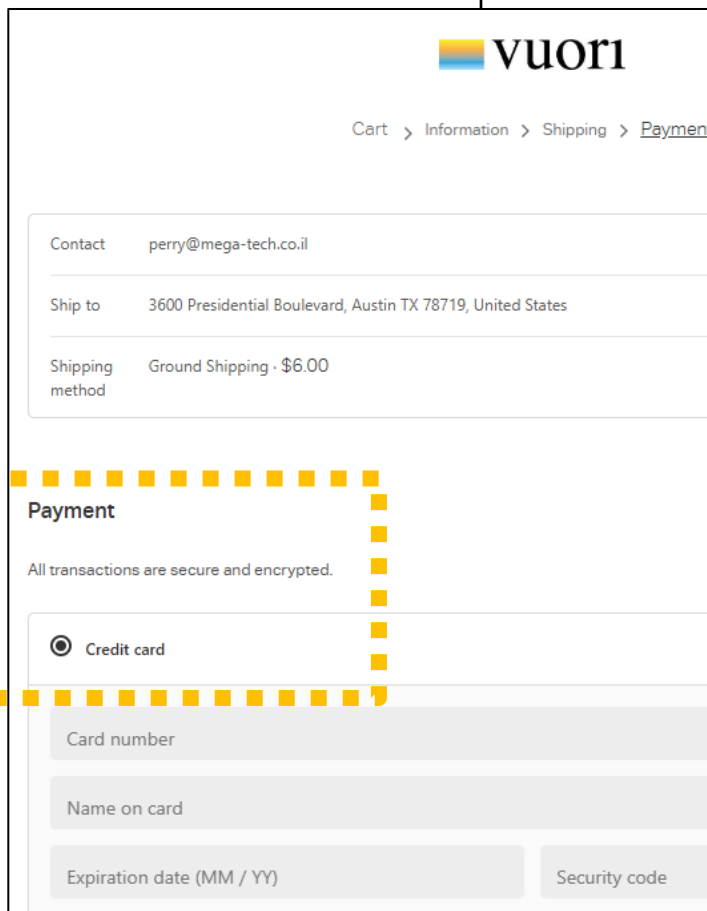
AML alleges that the customer can purchase a product on **Vuori's website** and can choose to use **Shop Pay to pay for the purchase price**. **The bridge computer at Vuori** will then debit the **customers account in Shop Pay**, to pay for the product.

The screenshot displays the Vuori checkout interface. At the top, there is a 'Back' link and the 'shop Pay' logo. The Vuori logo is prominently displayed at the top of the main content area. Below the logo, a sign-in prompt asks the user to 'Sign in or create an account' and provides an email input field. A blue button labeled 'Continue with shop Pay' is present, along with a link to 'Sign in with a passkey'. The 'Order summary' section lists the 'Strato Tech Tee | Chambray Heather' for \$54.00. Below this, there is a link to 'Add a discount code or a gift card'. The pricing breakdown shows a subtotal of \$54.00, shipping of \$6.00, and taxes of \$4.96, resulting in a total of \$64.96. A 'Back' link is located at the bottom of the dashed brown border. The footer contains the 'shop Pay' logo and a language selector set to 'English'.



determining from among the plurality of service providers, using the bridge computer, whether the given vendor is associated with the same service provider with which the user's account is maintained or is associated with a different service provider; and

AML alleges that the bridge computer can determine if a service provider, for example **Shop Pay** is associated with Vuori. For example, when the user checks out a product to purchase on Vuori's web site, Vuori lists **multiple service providers**, for example, **Credit/Debit card companies or Shop Pay** . If the customer selects **Shop Pay**, the bridge computer determines that **Shop Pay** is associated with Vuori and the customer can then proceed to pay for the purchase from Shop Pay, and by paying monthly installments to Shop Pay.



**vuori**

Cart > Information > Shipping > Payment

Contact perry@mega-tech.co.il

Ship to 3600 Presidential Boulevard, Austin TX 78719, United States

Shipping method Ground Shipping · \$6.00

**Payment**

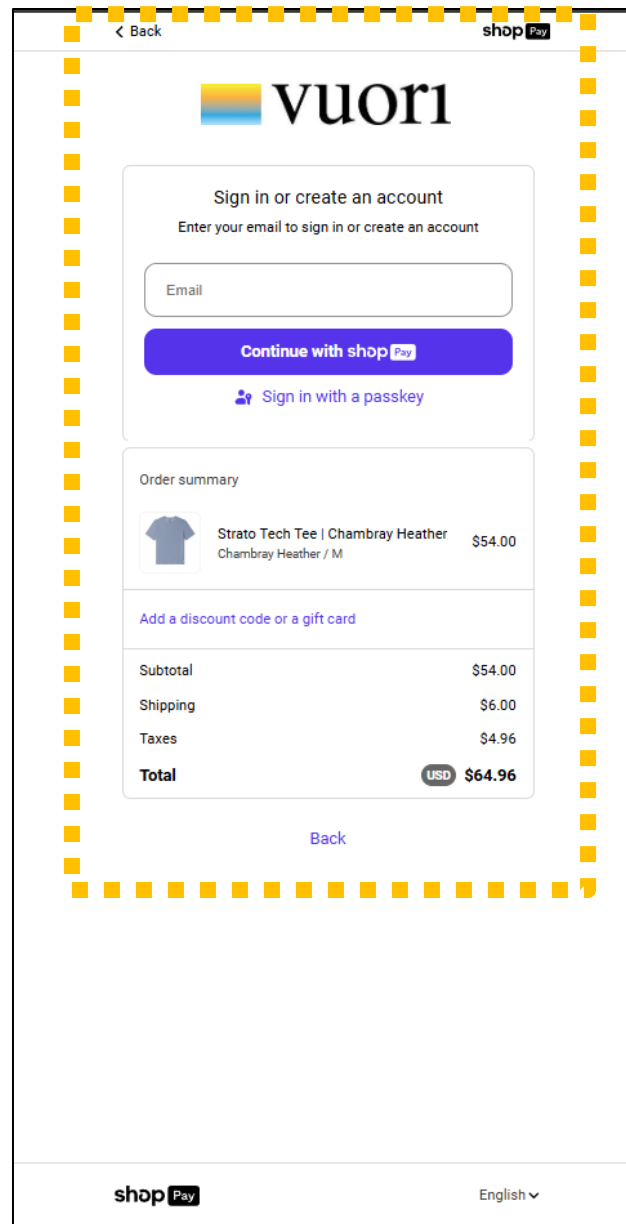
All transactions are secure and encrypted.

☒ Credit card

Card number

Name on card

Expiration date (MM / YY) Security code



< Back **shop Pay**


**vuori**

Sign in or create an account


Enter your email to sign in or create an account

Email

**Continue with shop Pay**

 Sign in with a passkey

Order summary

 Strato Tech Tee | Chambray Heather \$54.00  
Chambray Heather / M

[Add a discount code or a gift card](#)

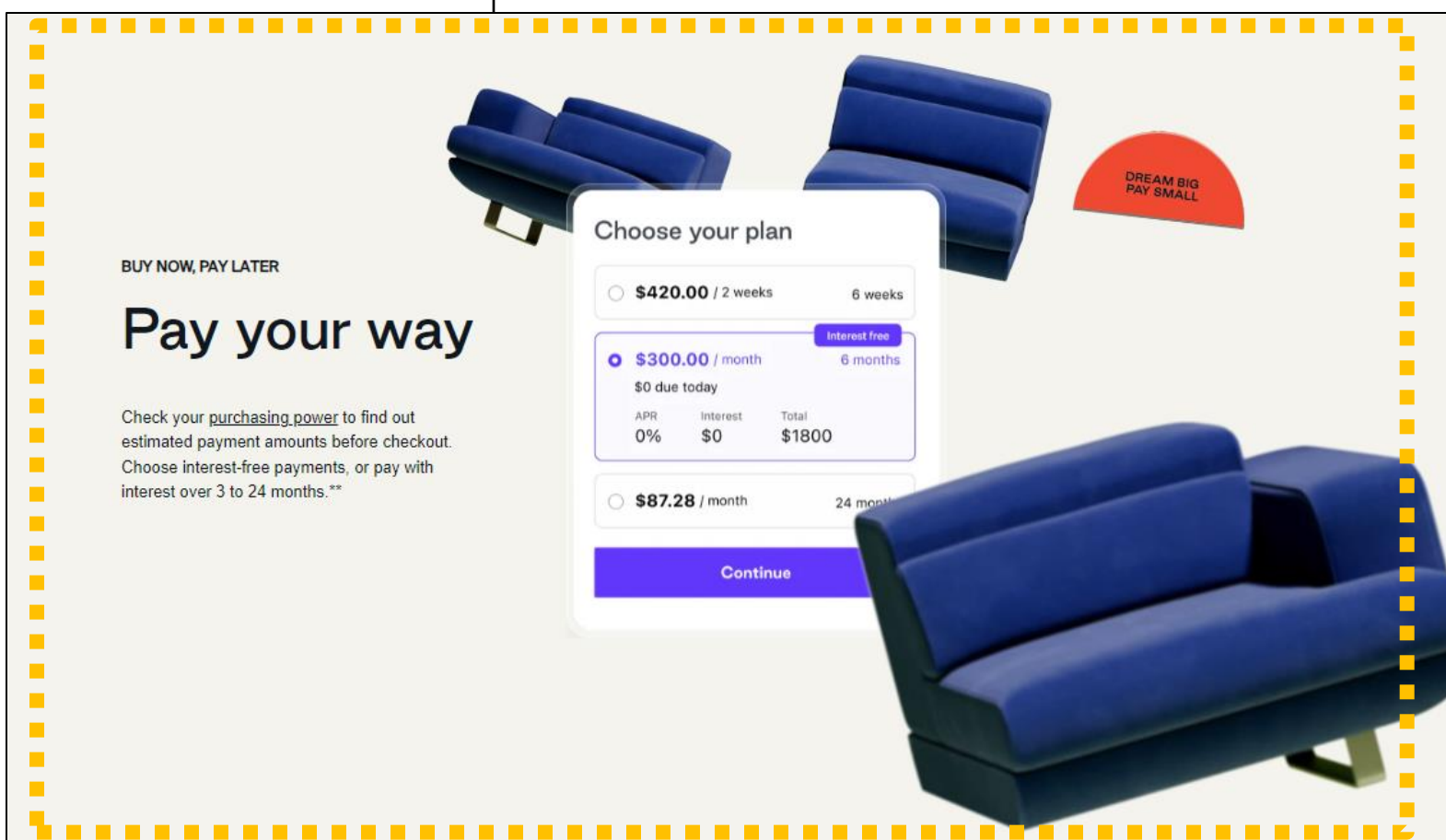
Subtotal	\$54.00
Shipping	\$6.00
Taxes	\$4.96
<b>Total</b>	<b>USD \$64.96</b>

Back

**shop Pay** English ▾

determining from among the plurality of service providers, using the bridge computer, whether the given vendor is associated with the same service provider with which the user's account is maintained or is associated with a different service provider; and

If the customer selects **Shop Pay**, the bridge computer determines that **Shop Pay** is associated with Vuori and the customer can then proceed to pay for the purchase from Shop Pay, and by allowing the customer to "choose your plan" by paying monthly installments to Shop Pay.



## US 6,876,979 : Claim 1

If the **service provider** with which the user's account is maintained is the same as the **service provider** with which the **vendor** is associated, crediting the given **vendor** by the purchase price using funds from the **user's account** at that same **service provider** and,

AML alleges that if the service provider (**Shop Pay**) with which the user's account is maintained is the same as the service provider (**Shop Pay**) with which the vendor (**Vuori**) is associated, crediting the given vendor (**Vuori**) by the purchase price using funds from the user's account at that same service provider (**Shop Pay**). This means that the bridge computer will credit **Vuori** the purchase price from the users **Shop Pay** account.

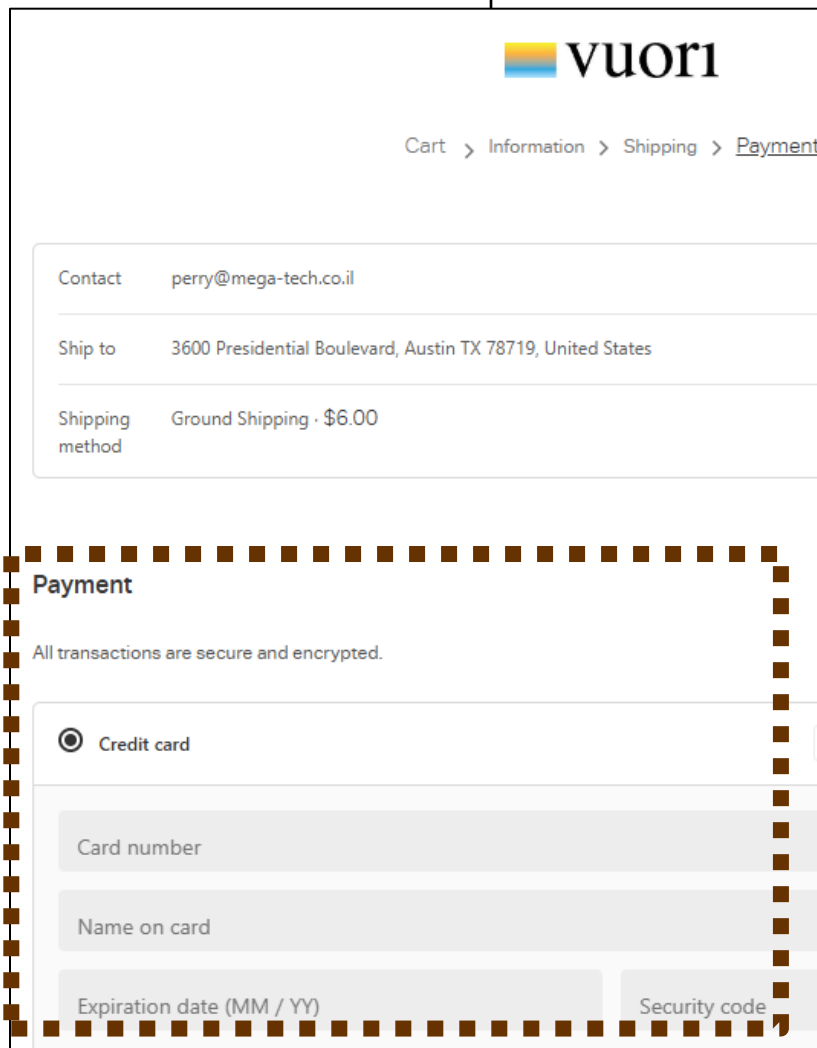
The screenshot displays the Vuori mobile app interface. At the top, there is a navigation bar with a back arrow and the 'shop Pay' logo. The main content area is framed by a green dashed border. Inside, the Vuori logo is prominently displayed. Below the logo, there is a section titled 'Sign in or create an account' with the instruction 'Enter your email to sign in or create an account'. This section includes an email input field and a blue button labeled 'Continue with shop Pay'. Below this button is a link for 'Sign in with a passkey'. Further down is the 'Order summary' section, which lists the item 'Strato Tech Tee | Chambray Heather' with a price of \$54.00. Below the item list is a link to 'Add a discount code or a gift card'. The bottom of the order summary shows a breakdown: Subtotal (\$54.00), Shipping (\$6.00), Taxes (\$4.96), and a Total of \$64.96. A 'Back' button is located below the order summary. At the very bottom of the screen, there is a footer with the 'shop Pay' logo and a language selector set to 'English'.

<https://vuoriclothing.com/>

## US 6,876,979 : Claim 1

if the **service provider** with which the user's account is maintained is different from the **service provider** with which the **vendor** is associated, crediting the given **vendor** by the purchase price using funds from the **service provider** with which the vendor is associated and using the bridge computer to reimburse that with the purchase **service provider** price using funds from the **user's account**.

AML alleges that if the service provider (**a credit or debit card company**) with which the user's account is maintained is different from the service provider (**Shop Pay**) with which the vendor (**Vuori**) is associated, crediting the given vendor (**Vuori**) by the purchase price using funds from the service provider (**Shop Pay**) with which the vendor (**Vuori**) is associated and using the bridge computer to reimburse that service provider (**Shop Pay**) with the purchase price using funds from the user's account (**from the debit or credit card companies**). AML alleges that if a user makes a purchase using a **credit or debit card**, the bridge computer will take the funds from the users account in **Shop Pay**, to pay for the purchase and will reimburse **Shop Pay** from funds from the users **Credit or debit card** account.



**vuori**

Cart > Information > Shipping > Payment

Contact perry@mega-tech.co.il

Ship to 3600 Presidential Boulevard, Austin TX 78719, United States

Shipping method Ground Shipping - \$6.00

**Payment**

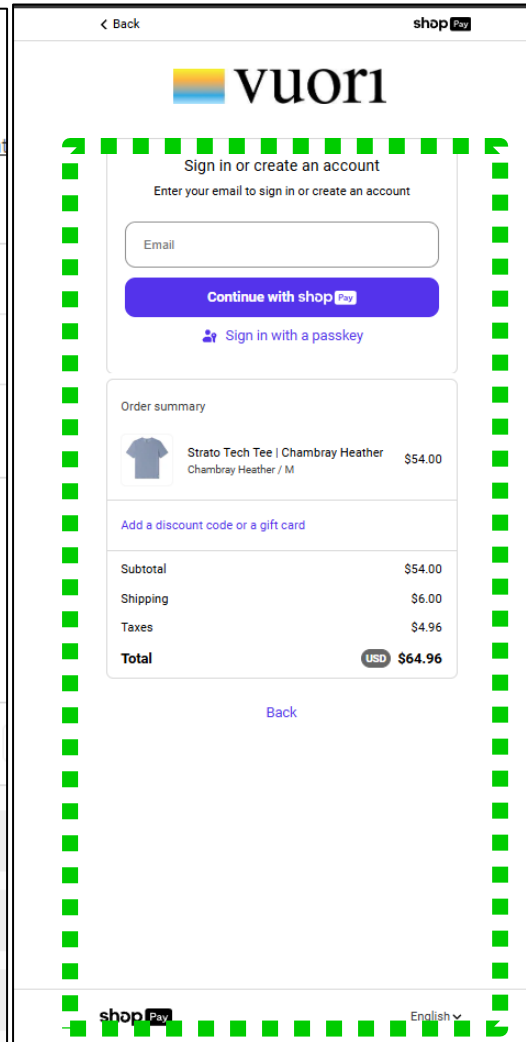
All transactions are secure and encrypted.

☒ Credit card

Card number

Name on card

Expiration date (MM / YY) Security code



< Back shop Pay

**vuori**

Sign in or create an account

Enter your email to sign in or create an account

Email

Continue with shop Pay

Sign in with a passkey

Order summary

Strato Tech Tee | Chambray Heather  
Chambray Heather / M \$54.00

Add a discount code or a gift card

Subtotal \$54.00

Shipping \$6.00

Taxes \$4.96

**Total** USD **\$64.96**

Back

shop Pay English

<https://vuoriclothing.com/>

# US 6,876,979 Claim 7-12

## CLAIMS:

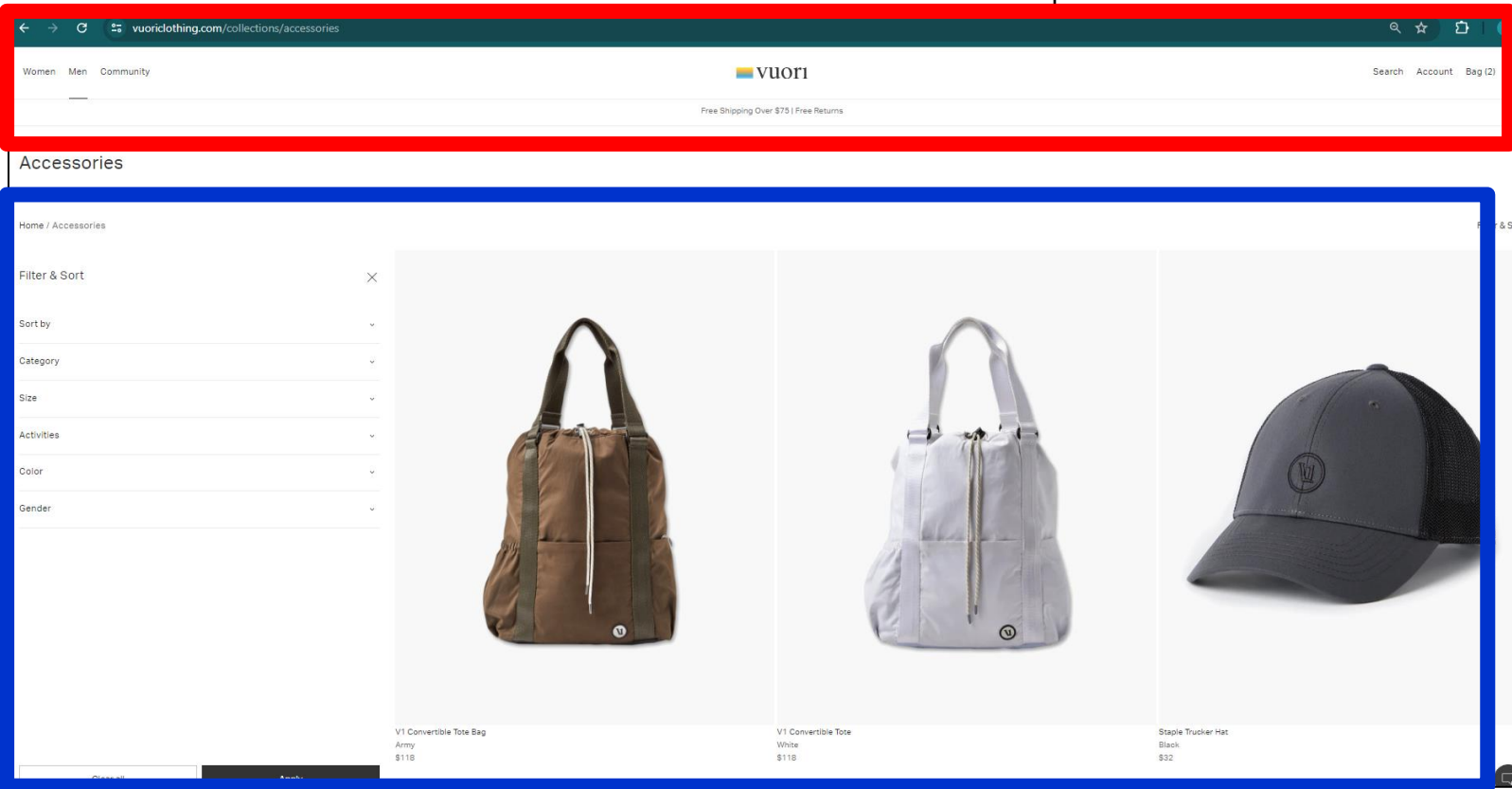
7. The method defined in claim 1 wherein the vendor offers the product for sale on a web site and wherein the method further comprises using the bridge computer to provide the user at the user device with a screen that includes a buy option when the user selects an on-screen option indicating that the user desires to purchase the product.

10. The method defined in claim 1 further comprising using the bridge computer to allow a user without an account to create a new service provider account when that user attempts to purchase products from a vendor, wherein the new account is created with the service provider associated with that vendor.

12. The method defined in claim 1 wherein the product is a tangible product, the method further comprising using a web site on the vendor computer to offer the product for sale.

7. The method defined in claim 1 wherein the vendor offers the product for sale on a web site and wherein the method further comprises using the bridge computer to provide the user at the user device with a screen that includes a buy option when the user selects an on-screen option indicating that the user desires to purchase the product.

For example, Vuori provides a **web site** for **electronic commerce** that allows a user to make a product purchase



10. The method defined in claim 1 further comprising using the bridge computer to allow a user without an account to create a new service provider account when that user attempts to purchase products from a vendor, wherein the new account is created with the service provider associated with that vendor.

For example, **Vuori** is a Vendor associated with Shop Pay that uses a computer to manage a user account and allows the user to “create an account”.

< Back shop Pay

**vuori**

Sign in or create an account  
Enter your email to sign in or create an account

Email

Continue with shop Pay

Sign in with a passkey

Order summary

Strato Tech Tee | Chambray Heather \$54.00  
Chambray Heather / M

Add a discount code or a gift card

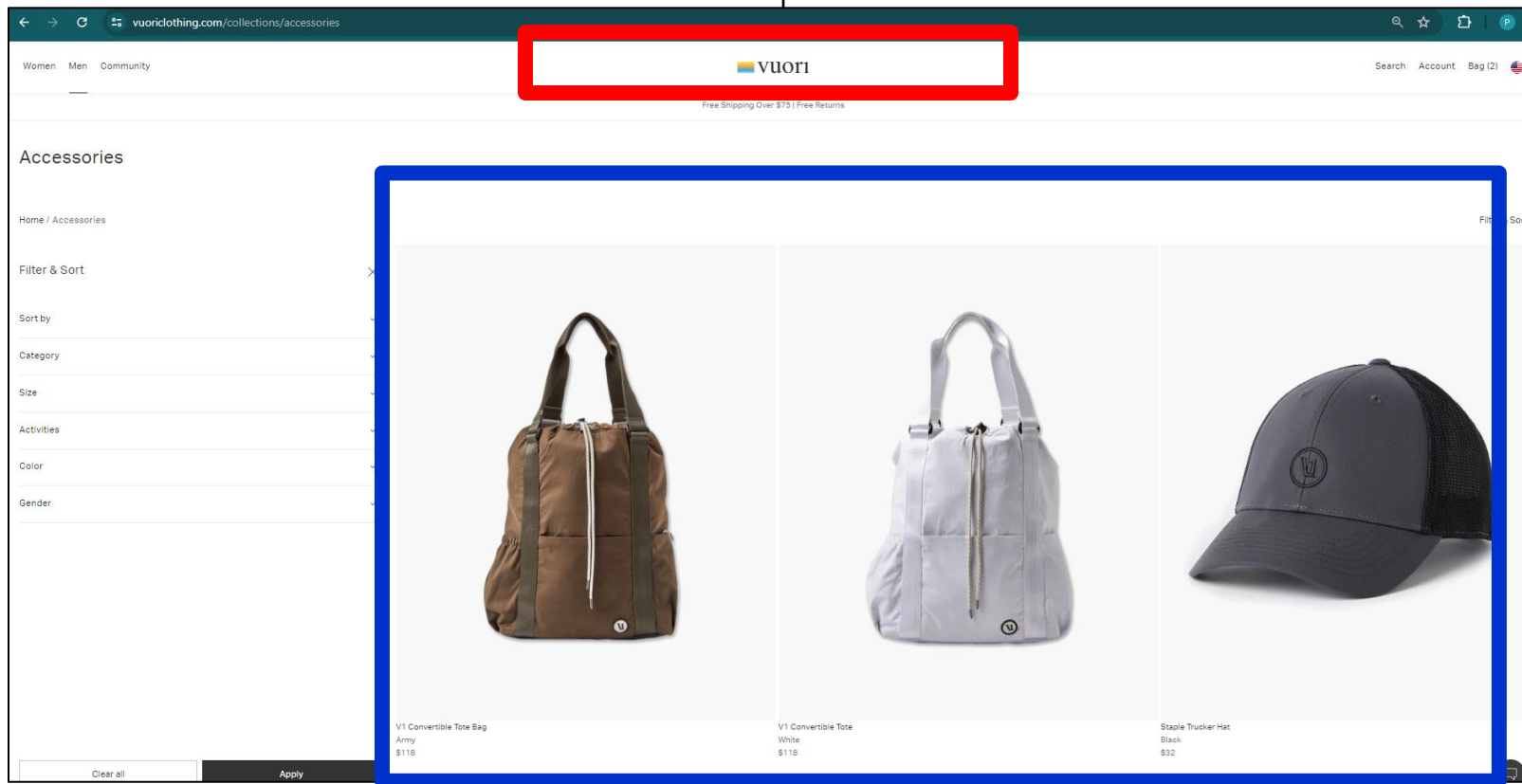
Subtotal	\$54.00
Shipping	\$6.00
Taxes	\$4.96
<b>Total</b>	<b>USD \$64.96</b>

Back

shop Pay English

12. The method defined in claim 1 wherein the product is a tangible product, the method further comprising using a web site on the vendor computer to offer the product for sale.

For example, **Vuori** offers tangible product for sale, for example, tote bags, on their website.





**US 6,876,979: Claim 12**

13. The method defined in claim 1 wherein the product is an intangible product, the method further comprising using a web site on the vendor computer to offer the product for sale.

For example, **Vuori** offers intangible product for sale, for example, digital cards, on their website.

The Vuori logo, consisting of a small square icon with horizontal stripes in blue, yellow, and red, followed by the word "vuori" in a lowercase, sans-serif font.[Search](#) [Account](#)

Free Shipping Over \$75 | Free Returns

### Digital Gift Card

Gift Card

Amount

\$25.00

\$50.00

\$75.00

\$100.00

\$150.00

\$200.00

\$500.00